

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of themselves
and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE PERLMAN,
Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBAKER LLC
and JIMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10501 (PBS)

**PLAINTIFFS' MOTION FOR AN ORDER COMPELLING DEXIA TO PRODUCE
DOCUMENTS THAT IT WITHHELD UNDER IMPROPER CLAIMS OF ATTORNEY-
CLIENT PRIVILEGE AND WORK PRODUCT PROTECTION**

Pursuant to Fed. R. Civ. P. 37 and Local Rule 37.1, Plaintiffs in the above-captioned actions hereby move that the Court compel Dexia to produce documents that it withheld or redacted under improper claims of attorney-client privilege and/or work product protection.

In support of this motion, Plaintiffs submit the accompanying memorandum of law and the Declaration of Steven T. Voigt. This motion is filed in *Janet Baker, et. al. v. Dexia, S.A., et. al.*, No.: 04-CV-10501 (PBS). All of the Plaintiffs in the different captions above rely on the Declaration of Steven T. Voigt, but because of the voluminous nature of the filing it has been filed in only *Baker v. Dexia, supra*.

WHEREFORE, Plaintiffs respectfully request that the instant motion be GRANTED in full.

Certification Under Local Rules 7.1(a)(2) and 37.1

Pursuant to Local Rules 7.1(a)(2) and 37.1, undersigned counsel hereby certify that counsel for Plaintiffs have conferred with counsel for Dexia in a good faith, but unsuccessful, attempt to secure the requested relief without intervention of this Court.

Dated: June 16, 2006

Respectfully submitted,

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